

that the '669 patent discloses this limitation, and generally cites column 2 and column 7 to support the rejection. Applicant disagrees. Nothing in this text discloses (or even suggests) a virtual disk object that is separate from a virtualized logical disk object, wherein the virtual disk object is an abstract
5 representation of one or more virtualized logical disk objects, the virtual disk object including an exposed management interface, as recited in claim 1. Therefore, the '669 patent cannot anticipate independent claim 1.

Claims 2-8 depend from independent claim 1, and are allowable at least by virtue of their dependency.

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Claims 9-16

The '669 patent cannot anticipate (or render obvious) independent claim 9 because the '669 patent neither discloses (nor even suggests) limitations explicitly recited in independent claim 9. Among other limitations, claim 9
15 recites "specifying at least some of the plurality of physical disk drives for inclusion in a storage cell." The Action asserts that the '669 patent discloses this limitation, and cites column 15 to support the assertion. Applicant disagrees. Nothing in column 15 discloses (or even suggests) specifying at least some of the plurality of physical disk drives for inclusion in a storage cell,
20 as recited in claim 9. Therefore, the '669 patent cannot anticipate independent claim 9.

Claim 9 further recites as a separate element "creating a storage cell object representing the storage cell wherein the physical store objects corresponding to the specified physical disk drives are included in the created

storage cell.” The Action asserts that the ‘669 patent discloses this limitation, and generally cites column 8 and column 9 to support the rejection. Applicant disagrees. Nothing in this text discloses (or even suggests) creating a storage cell object representing the storage cell wherein the physical store objects

5 corresponding to the specified physical disk drives are included in the created storage cell, as recited in claim 9. Therefore, the ‘669 patent cannot anticipate independent claim 9.

Claims 10-16 depend from independent claim 9, and are allowable at least by virtue of their dependency.

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Claims 17-18

The ‘669 patent cannot anticipate (or render obvious) independent claim 17 because the ‘669 patent neither discloses (nor even suggests) limitations explicitly recited in independent claim 17. Claim 17 recites “creating a logical

15 disk object representing a virtual storage container, wherein the logical disk is an abstract representation of physical storage capacity provided by plurality of physical stores.” The Action appears to assert that the LUN described in the ‘669 patent discloses this limitation, and cites column 16 and column 17 to support the assertion.

20 Claim 17 further recites as a separate element “creating a virtual disk object comprising the logical disk object, the derived disk object and the presented disk object.” The Action asserts that the ‘669 patent discloses this limitation, and generally cites tables 1 and 2, and columns 17-18 to support the rejection. Applicant disagrees. Nothing in this text discloses (or even suggests)

a virtual disk object that is separate from a virtualized logical disk object, much less a derived disk object and the presented disk object, as recited in claim 17.

Therefore, the '669 patent cannot anticipate independent claim 17.

Claim 18 depend from independent claim 17, and is allowable at least by
5 virtue of the dependency.